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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 CHARLES ASBERGER,)
13 Plaintiff,) Case No. 1:14-cv-01209-RFB-PAL
14 v.)
15 CAROLYN W. COLVIN,)
16 Acting Commissioner of Social Security,)
17 Defendant.)

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

18 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
19 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm by
20 30 days from March 2, 2015, to and including April 1, 2015.

22 Defendant respectfully requests this extension due to a heavy workload, including several other
23 district court cases, despite due diligence. Defendant therefore needs additional time to properly address
24 the issues Plaintiff raises in his Motion for Reversal and/or Remand. This request is made in good faith
25 with no intention to unduly delay the proceedings.
26

On February 26, 2015, Counsel for Defendant conferred with Plaintiff's counsel who had no objection to this motion.

Respectfully submitted this 26th day of February 2015.

DANIEL G. BOGDEN
United States Attorney

/s/ Lynn M. Harada
LYNN M. HARADA
Special Assistant United States Attorney

OF COUNSEL:

DONNA L. CALVERT
Regional Chief Counsel, Region IX

IT IS SO ORDERED:

Terry A. Teer
UNITED STATES MAGISTRATE JUDGE

DATED: March 5, 2015

CERTIFICATE OF SERVICE

I, LYNN M. HARADA, certify that the following individual was served with a copy of the
UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of service
identified below:

CM/ECF:

Marc V. Kalagian
Rohlfing & Kalagian, LLP
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Dated this 26th day of February 2015.

/s/ Lynn M. Harada
LYNN M. HARADA
Special Assistant United States Attorney